

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA

]

V.

]

NO: 3:09-CR-102

SCOTT HAINES

]

JUDGE TRAUGER

MOTION FOR TERMINATION OF SUPERVISED RELEASE

Comes now the defendant, Scott Haines, by and through counsel, and respectfully moves, pursuant to 18 U.S.C. § 3583(e)(1), that his three-year term of supervised release be terminated after his successful completion of one-year of supervision, which would be as of December 16, 2012.

In support of this Motion, Mr. Haines would show the following:

1. Pursuant to 18 U.S.C. § 3583(e)(1) and *U.S. v. Spinelle*, 41 F.3d 1056 (6th Cir. 1994) a district court may “terminate a term of supervised release and discharge a defendant released at any time after the expiration of one year of supervised release...if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice.”

2. Mr. Haines was released from Bureau of Prisons custody, and placed under the care and control of United States Probation Officer Amanda Russell, on December 16, 2011. Since his placement on supervised release, he has abided by all conditions and requirements of supervised release, passed all drug screens and